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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

The United States respectfully submits the following second amended list of exhibits it may introduce at a trial of this matter. The government may seek to supplement this list as trial preparations progress, and will notify the defendant and the Court of any changes to its Exhibit List. Accordingly, leave is respectfully requested to amend this list as circumstances may change.

1 DATED: November 18, 2022

Respectfully submitted,

2 STEPHANIE M. HINDS
3 United States Attorney

4 /s/ Andrew Paulson
5 ANDREW PAULSON
6 MOLLY K. PRIEDEMAN
7 Assistant United States Attorney

United States v. Ray Garcia (Case No. 4:21-cr-00429-YGR)
United States' Second Amended Exhibit List

Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
1	Dried Rose		S		
2	Calendar from K.D.		S		
3	R. Garcia's BOP Phone		S		
4	R. Garcia's Personal Phone		S		
5	R. Garcia's Personal Computer		S		
6	Crochet Bikini		S		
7	Photo of Cell			X	
8	Photo of Cell		S		
9	Photo of Cell		S		
10	Photo of Cell			X	
11	Photo of Cell			X	
12	Photo of Cell			X	
13	Photo of Bathroom in Warden Complex		S		
14	Photo of Bathroom in Warden Complex		S		
15	Photo of Bathroom in Warden Complex			X	
16	Photo of Bathroom in Warden Complex		S		
17	Photo of Bathroom in Warden Complex			X	
18	Photo of Bathroom in Warden Complex			X	
19	Photo of Bathroom in Warden Complex			X	
20	Photo of Bathroom in Warden Complex			X	
21	Photo of Cell		S		
22	Photo of Cell			X	
23	Photo of Cell		S		
24	Photo of Cell			X	
25	Photo of Cell			X	
26	Photo of Cell			X	
27	Photo of Cell			X	
28	Photo of Cell			X	
29	Photo of Bathroom in Visitation			X	
30	Photo of Bathroom in Visitation			X	
31	Photo of Bathroom in Visitation			X	
32	Photo of Bathroom in Visitation		S		
33	Photo of Bathroom in Visitation		S		
34	Photo of Bathroom in Visitation			X	

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
35	Photo of Bathroom in Visitation			X	
36	Photo of Bathroom in Visitation			X	
37	Photo of Bathroom in Visitation			X	
38	Photo of Bathroom in Visitation			X	
39	Photo of Visitation		S		
40	Photo of Changing Stalls in Visitation		S		
41	Photo of Changing Stalls in Visitation			X	
42	Photo of Changing Stalls in Visitation			X	
43	Photo of Changing Stalls in Visitation			X	
44	Photo of Changing Stalls in Visitation			X	
45	Photo of Visitation			X	
46	Photo of Visitation			X	
47	Photo of Visitation			X	
48	Photo of Visitation			X	
49	Photo of Supply Closet in Visitation			X	
50	Photo of Visitation		S		
51	Photo of Victim 1		S		
52	Photo of Victim 1			X	
53	Photo of Victim 1		S		
54	Photo of Victim 1			X	
55	Photo of Victim 1		S		
56	Photo of Victim 1			X	
57	Denial of Compassionate Release - Victim 1		S		
58	Denial of Compassionate Release - Victim 2		S		
59	Request for Compassionate Release - Victim 2		S		
60	Request for Transfer - Victim 1		S		
61	Request for Transfer - Victim 1		S		
62	Email from R. Garcia to FCI Dublin Lieutenants re Visitation Room Workers			X	
63	Email from R. Garcia to FCI Dublin Lieutenants re Visitation Room Workers			X	
64	Email from R. Hinkle to R. Garcia re Allegations re John Bellhouse			X	

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
65	Photo of Victim 3		S		
66	Photo of Victim 3		S		
67	Photo of Victim 3			X	
68	Photo of Victim 3			X	
69	Photo of Victim 3			X	
70	Photo of Victim 3		S		
71	Photo of Victim 3		S		
72	Photo of Victim 3		S		
73	Photo of Victim 3			X	
74	Photo of Victim 3			X	
75	Photo of Victim 3		S		
76	Photo of Victim 3			X	
77	Photo of Victim 3			X	
78	Photo of Victim 3			X	
79	Photo of Victim 3			X	
80	Photo of Victim 3			X	
81	Photo of Victim 3			X	
82	Photo of Victim 3			X	
83	Photo of Victim 3			X	
84	Photo of Victim 3		S		
85	Photo of Victim 3			X	
86	Photo of Victim 3			X	
87	Photo of Victim 3			X	
88	Photo of Victim 3			X	
89	Photo of Victim 3			X	
90	Photo of Victim 3		S		
91	Photo of Victim 3		S		
92	Photo of Victim 3			X	
93	Photo of Victim 3			X	
94	Photo of Victim 3			X	
95	Photo of Victim 3			X	
96	Photo of Victim 3			X	
97	Photo of Victim 3			X	
98	Photo of Victim 3			X	
99	Photo of Victim 3			X	
100	Photo of Victim 3			X	
101	Photo of Victim 3			X	
102	Photo of Victim 3			X	
103	Photo of Victim 3			X	
104	Photo of Victim 3			X	

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
105	Photo of Victim 3			X	
106	Photo of Victim 3			X	
107	Photo of Victim 3			X	
108	Photo of Victim 3			X	
109	Photo of Victim 3			X	
110	Photo of Victim 3			X	
111	Photo of Victim 3			X	
112	Photo of Victim 3			X	
113	Photo of Victim 3			X	
114	Photo of Victim 3			X	
115	Google Certification of Authenticity		S		
116	Google Account Subscriber Information		S		
117	Email from Total Wireless			X	
118	Email from Total Wireless			X	
119	Certification of Custodian of Records - TracFone		S		
120	Subscriber Information - TracFone		S		
121	Call Detail Records - TracFone		S		
122	Evidence Custody Document - 2021 Planner for Victim 2			X	
123	Photos of 2021 Planner - Victim 2			X	
124	Photos of Dried Rose		S		
125	Photo of Crochet Bikini		S		
126	Calendar from K.D.		S		
127	Photo of R. Garcia's Penis			X	
128	Photo of R. Garcia's Penis			X	
129	Photo of R. Garcia's Penis			X	
130	Photo of R. Garcia's Penis			X	
131	Photo of R. Garcia's Penis			X	
132	Photo of R. Garcia's Penis			X	
133	Photo of R. Garcia's Car			X	
134	Photo of R. Garcia's Car			X	
135	Photo of Driver's Side of R. Garcia's Car			X	
136	Photo of Trunk of R. Garcia's Car			X	
137	Photo of Passenger Side of R. Garcia's Car			X	
138	Photo of Candy on Floorboard of R. Garcia's Car			X	

United States v. Ray Garcia (Case No. 4:21-cr-00429-YGR)**United States' Second Amended Exhibit List**

Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
139	Photo of Candy in Driver's Side Door of R. Garcia's Car			X	
140	Photo of Candy Found in R. Garcia's Car			X	
141	Photo of Candy in Center Console of R. Garcia's Car			X	
142	Photo of Phone in Center Console of R. Garcia's Car			X	
143	Photo of R. Garcia's Personal Phone Found in Center Console			X	
144	Photo of R. Garcia's Personal Phone Found in Center Console			X	
145	Photo of Bag of Candy in Trunk of R. Garcia's Car			X	
146	Photo of Bag of Candy in Trunk of R. Garcia's Car			X	
147	Photo of Candy Found in Trunk of R. Garcia's Car			X	
148	Photo of Candy in Glove Box of R. Garcia's Car			X	
149	Photo of R. Garcia's Personal Cellphone			X	
150	Photo of R. Garcia's Personal Cellphone			X	
151	Photo of R. Garcia's Personal Cellphone			X	
152	Photo of R. Garcia's Bag			X	
153	Photo of R. Garcia's BOP-Issued Cellphone			X	
154	Photo of R. Garcia's Bag			X	
155	Photo of R. Garcia's Office in Residence			X	
156	Photo of R. Garcia's Office in Residence			X	
157	Photo of R. Garcia's Bedroom			X	
158	Photo of R. Garcia's Bedroom			X	
159	Photo of R. Garcia's Bedroom and Bathroom			X	
160	Photo of R. Garcia's Bathroom			X	
161	Photo of R. Garcia's Office in Residence			X	
162	Photo of Laptop Found in R. Garcia's Office in Residence			X	
163	Photo of Laptop Found in R. Garcia's Office in Residence			X	
164	Warnings and Assurances for Interview of R. Garcia		S		

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
165	Interview of R. Garcia		S		
166	Silicon Valley RCFL Evidence Details		S		
167	Silicon Valley RCFL Evidence Details		S		
168	Silicon Valley RCFL Evidence Details		S		
169	Silicon Valley RCFL Evidence Details		S		
170	Silicon Valley RCFL Evidence Details		S		
171	Silicon Valley RCFL Evidence Details		S		
172	Photo of HP Laptop		S		
173	Photo of HP Laptop		S		
174	Photo of HP Laptop		S		
175	Photo of HP Laptop		S		
176	Property Record - R. Garcia's Cellphone		S		
177	Sign-In Sheet for PREA Training.pdf		S		
178	Sign-In Sheet for PREA Training.pdf		S		
179	Sign-In Sheet for Annual Correctional Training		S		
180	Training Acknowledgement - Sexually Abusive Behavior and Intervention Program		S		
181	Sign-In Sheet for Annual Correctional Training		S		
182	Annual Training Agenda 2017		S		
183	Annual Training Agenda 2018		S		
184	Annual Training Agenda 2019		S		
185	Annual Training Agenda 2021		S		
186	Annual Training Agenda 2020		S		
187	Email re pre-ACA/PREA Walk-Through		S		
188	PREA Audit Report - Final		S		
189	Employee Training Report: Any Time (R. Garcia)		S		
190	FCI Dublin PREA Standard 115.13 (a)-1,2,3 - Supervision and Monitoring.pdf		S		

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
191	FCI Dublin PREA Standard 115.21 (c)-1,2,3,4,5,6,7,8 - Evidence Protocol and Forensic Medical Examinations.pdf		S		
192	FCI Dublin PREA Standard 115.21 (e)-1 - Evidence Protocol and Forensic Medical Examinations.pdf		S		
193	FCI Dublin PREA Standard 115.21 (f)-1 - Evidence Protocol and Forensic Medical Examinations.pdf		S		
194	FCI Dublin PREA Standard 115.33 (a)-1,2 - Inmate Education.pdf		S		
195	FCI Dublin PREA Standard 115.42 (a)-1 - Use of Screening Information.pdf		S		
196	FCI Dublin PREA Standard 115.51 (b)-1 - Inmate Reporting.pdf		S		
197	FCI Dublin PREA Standard 115.62 (a)-2,3,4 - Agency Protection Duties.pdf		S		
198	FCI Dublin PREA Standard 115.76 (b)-1,2(c)-1,2(d)-1,2 - Disciplinary Sanctions for Staff.pdf		S		
199	BOP PREA Poster (English)		S		
200	BOP PREA Poster (Spanish)		S		
201	Employee Training Report: Any Time (R. Garcia)		S		
202	Training Presentation: Sexually Abusive Behavior		S		
203	Sexual Abuse/Assault Allegation Paperwork			X	
204	Recording of Telephone Call Involving T.A. and C.V.			X	
205	Excerpt of Recording of Telephone Call Involving T.A. and C.V.			X	
206	Garcia Photo		S		
207	Inmate Photo - J.A.			X	
208	Inmate Photo - S.B.			X	
209	Inmate Photo - R.B.		S		
210	Inmate Photo - S.C.			X	
211	Inmate Photo - Y.C.		S		

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
212	Inmate Photo - K.D.		S		
213	Inmate Photo - C.F.			X	
214	Inmate Photo - Victim 2		S		
215	Inmate Photo - L.F.			X	
216	Inmate Photo - D.G.			X	
217	Inmate Photo - Victim 1		S		
218	Inmate Photo - M.M.		S		
219	Inmate Photo - A.Q.		S		
220	Inmate Photo - Victim 3		S		
221	Inmate Photo - G.R.		S		
222	Inmate Photo - K.S.			X	
223	Inmate Photo - T.T.		S		
224	Inmate Photo - C.V.		S		
225	CMS Entrance		S		
226	CMS Hallway		S		
227	CMS Shop 1		S		
228	CMS Shop 2		S		
229	CMS Shop 3		S		
230	CMS Supervisor Doorway		S		
231	F-Unit Front		S		
232	F-Unit Laundry Room 1		S		
233	F-Unit Laundry Room 2		S		
234	F-Unit Laundry Room 3		S		
235	F-Unit Laundry Room 4		S		
236	F-Unit Rear		S		
237	F-Unit Shower Stall 1			X	
238	F-Unit Shower Stall 2			X	
239	F-Unit Shower Stall 3		S		
240	Rec Area 1		S		
241	Rec Area 2		S		
242	Rec Area 3		S		
243	K.D. Cell Photo 1		S		
244	K.D. Cell Photo 2		S		
245	K.D. Cell Photo 3		S		
246	K.D. Cell Photo 4		S		
247	K.D. Cell Photo 5		S		
248	Victim 2 Cell Photo 1		S		
249	Victim 2 Cell Photo 2		S		
250	Victim 2 Cell Photo 3		S		
251	Victim 2 Cell Photo 4			X	

United States v. Ray Garcia (Case No. 4:21-cr-00429-YGR)**United States' Second Amended Exhibit List**

Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
252	Victim 2 Cell Photo 5			X	
253	Victim 2 Cell Photo 6		S		
254	Victim 2 Cell Photo 7			X	
255	Victim 2 Cell Photo 8		S		
256	Victim 2 Cell Photo 9		S		
257	Victim 2 Cell Photo 10			X	
258	Victim 1 Cell Photo 1		S		
259	Victim 1 Cell Photo 2		S		
260	Victim 1 Cell Photo 3		S		
261	Victim 1 Cell Photo 4			X	
262	Victim 1 Cell Photo 5			X	
263	M.M. Cell Photo 1		S		
264	M.M. Cell Photo 2			X	
265	M.M. Cell Photo 3		S		
266	M.M. Cell Photo 4		S		
267	M.M. Cell Photo 5			X	
268	Victim 3 Cell Photo 1		S		
269	Victim 3 Cell Photo 2		S		
270	Victim 3 Cell Photo 3		S		
271	Victim 3 Cell Photo 4			X	
272	Victim 3 Cell Photo 5			X	
273	Request for Compassionate Release - Victim 2 (Certified Translation)		S		
274	Request for Compassionate Release - Victim 2 (Certificate of Translation)		S		
275	Ethics/Standards of Conduct - Annual Training 2019 Lesson Plan		S		
276	Ethics/Standards of Conduct - Annual Training 2019		S		
277	Ethics/Standards of Conduct - Annual Training 2020 Lesson Plan		S		
278	Ethics/Standards of Conduct - Annual Training 2020		S		
279	Ethics/Standards of Conduct - Annual Training 2021 Lesson Plan		S		
280	Ethics/Standards of Conduct - Annual Training 2021		S		
281	Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2019 Lesson Plan		S		

United States v. Ray Garcia (Case No. 4:21-cr-00429-YGR)**United States' Second Amended Exhibit List**

Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
282	Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2019		S		
283	Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2020 Lesson Plan		S		
284	Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2020		S		
285	Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2021 Lesson Plan		S		
286	Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2021		S		
287	Harley Davidson Daily Planner			X	
288	Photo of R. Garcia's Penis			X	
289	Photo of R. Garcia's Penis			X	
290	Photo of R. Garcia's Penis			X	
291	Photo of R. Garcia's Penis			X	
292	Photo of R. Garcia's Penis			X	
293	Photo of R. Garcia's Penis			X	
294	Photo of R. Garcia's Penis			X	
295	Photo of R. Garcia's Penis			X	
296	Photo of R. Garcia's Penis			X	
297	Photo of R. Garcia's Penis			X	
298	Photo of R. Garcia's Penis			X	
299	Photo of R. Garcia's Penis			X	
300	Photo of R. Garcia's Penis			X	
301	Photo of R. Garcia's Penis			X	
302	Photo of R. Garcia's Penis			X	
303	Photo of R. Garcia's Penis			X	
304	Photo of R. Garcia's Penis			X	
305	Photo of R. Garcia's Penis			X	
306	Photo of R. Garcia's Penis			X	
307	Photo of R. Garcia's Penis			X	
308	Inmate Photo - S.S.		S		
309	Request for Transfer / Application of Management Variable (Victim 1) (June 4, 2020)		S		
310	Associate Warden Job Description		S		

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
311	Warden Job Description		S		
312	Diagram of FCI Dublin		S		
313	Aerial View of FCI Dublin		S		
314	Aerial View of FCI Dublin (Labeled) - 1		S		
315	Aerial View of FCI Dublin (Labeled) - 2		S		
316	DFE Michael Kan – <i>Curriculum Vitae</i>				
317	Expert Report of DFE Michael Kan				
318	Photo of F-Unit Exterior 1		S		
319	Photo of F-Unit Exterior 2		S		
320	Photo of F-Unit Exterior 3		S		
321	Photo of F-Unit Exterior 4		S		
322	Photo of F-Unit Exterior 5		S		
323	Photo of F-Unit Exterior 6		S		
324	Photo of F-Unit Exterior 7		S		
325	Photo of F-Unit Exterior 8		S		
326	Photo of Hallway Near F-Unit Laundry Room		S		
327	Photo of Hallway Near F-Unit Laundry Room		S		
328	Photo of F-Unit Laundry Room (LAF2)		S		
329	Photo of F-Unit Laundry Room (LAF2)		S		
330	Photo of F-Unit Laundry Room (LAF2)		S		
331	Photo of F-Unit Laundry Room (LAF2)		S		
332	Photo of F-Unit Laundry Room (LAF2)		S		
333	Photo of F-Unit Laundry Room (LAF2)		S		
334	Photo of F-Unit Laundry Room (LAF2)		S		
335	Photo of F-Unit Laundry Room (LAF2)		S		
336	Photo of F-Unit Laundry Room (LAF2)		S		
337	Photo of F-Unit Laundry Room (LAF2)		S		
338	Photo of F-Unit Laundry Room (LAF2)		S		

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Exhibit No.	Description	Sponsoring Witness	Stip. to Admit	Objection	Date Admitted
339	Photo of F-Unit Laundry Room (LAF2)		S		
340	Photo of F-Unit Laundry Room (LAF2)		S		
341	Inmate Discipline Report - PD 15 - Chrono		S		
342	Inmate Discipline Report - PD 15 - Special		S		
343	Inmate Discipline Report - Pending		S		
344	Inmate Discipline Report - DARTS		S		
345	Transcript of Interview of R. Garcia				
346	Excerpts of Sexually Abusive Behavior Prevention and Intervention Program - Annual Training 2020		S		